

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBIN JERSTAD,

Plaintiff,

- against -

NEW YORK VINTNERS LLC,

Defendant.

Docket No. 18-cv-10470 (JGK)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon this Notice of Motion; the declaration of Richard Liebowitz and exhibits attached thereto, and the pleadings and prior proceedings herein; Plaintiff Robin Jerstad will move the Court, before the Honorable John F. Koeltl (U.S.D.J.) at the United States District Court, 500 Pearl Street, New York, NY 10007, Courtroom 14A, at a time and place determined by the Court (but not less than 14 days from the effective date of service of this motion) for an Order GRANTING Plaintiff's application for default judgment in the amount of \$3,000.00 in actual damages under 17 U.S.C. § 504(b); \$10,000 in statutory damages under 17 U.S.C. § under § 1203(c)(3)(B); \$4037.50 in attorneys' fees and \$475.00 costs under 17 U.S.C. § 505; and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Defendant's opposition papers, if any, must be served within 14 days after personal service of this motion upon Defendant at its last known business address listed below (and if service cannot be effectuated at that address, then 14 days after service is made via New York's Office of Secretary of State).

Respectfully Submitted,

LIEBOWITZ LAW FIRM, PLLC

/richardliebowitz/

Richard Liebowitz, Esq.

11 Sunrise Plaza, Ste. 305

Valley Stream, NY 11580

Counsel for Plaintiff Robin Jerstad

TO:

New York Vintners, LLC

63 Barclay Street

New York, NY 10007

Defendant